UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

_ :

Erin Sullivan, :

Civil Action No.: 11-cv-01004-TJM-DRH

Plaintiff,

v.

Accounts Receivable Management, Inc.; and DOES 1-10, inclusive,

Defendant.

NOTICE OF WITHDRAWAL OF COMPLAINT AND VOLUNTARY DISMISSAL OF ACTION WITH PREJUDICE PURSUANT TO RULE 41(a)

Erin Sullivan ("Plaintiff"), by Plaintiff's attorney, hereby withdraws the complaint and voluntarily dismisses this action, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: November 30, 2011

Respectfully submitted,

By: /s/ Sergei Lemberg

Sergei Lemberg (SL 6331) Lemberg & Associates L.L.C. 1100 Summer Street, 3rd Floor Stamford, CT 06905

Telephone: (203) 653-2250 Facsimile: (203) 653-3424 Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2011, a true and correct copy of the foregoing Notice of Withdrawal was served electronically by the U.S. District Court for the Northern District of New York Electronic Document Filing System (ECF) and that the document is available on the ECF system.

By /s/ Sergei Lemberg

Sergei Lemberg